

Exhibit A

Akin Gump

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November 30, 2020

VIA E-MAIL

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Re: In re: Purdue Pharma L.P. et al., No. 19-23649 (Bankr. S.D.N.Y.) - Unsealing
UCC Privileges Submissions

Dear Counsel:

As you know, we represent the Official Committee of Unsecured Creditors of Purdue Pharma L.P. (the “UCC”). We write pursuant to Paragraph 73(i) of the Third Amended Protective Order (“Protective Order”) [ECF No. 1935] concerning the filing, without sealing or



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redaction of: (i) *Official Committee of Unsecured Creditors' Motion to Compel Production of Purportedly Privileged Documents, or for In Camera Review, Based on Failure of the Sacklers and the Debtors to Demonstrate Documents Identified on Logs are Privileged* [ECF No. 1752]; (ii) *Official Committee of Unsecured Creditors' Motion to Compel Production of Purportedly Privileged Documents, or for In Camera Review, Based on Good Cause, Crime Fraud and at Issue Exceptions to Claims of Privilege* [ECF No. 1753]; (iii) *Declaration of Mitchell Hurley dated September 29, 2020* [ECF No. 754]; (iv) *Official Committee of Unsecured Creditors' Reply in Support of its Motion to Compel Production of Purportedly Privileged Documents, or for In Camera Review, Based on Failure of the Sacklers to Demonstrate Documents Identified on Logs Are Privileged* [ECF No. 2013]; (v) *Official Committee of Unsecured Creditors' Reply in Support of its Motion to Compel Production of Purportedly Privileged Documents, or for In Camera Review, Based on Good Cause, Crime Fraud, and At Issue Exceptions to Privilege* [ECF No. 2014]; and (vi) *Declaration of Arik Preis dated November 18, 2020* [ECF No. 2015] (collectively, the "UCC Privileges Submissions").

The UCC Privileges Submissions include information designated by your clients as Protected Information, and the UCC therefore was required in the first instance to redact from the public record and file under seal allegedly confidential information pursuant to the Protective Order. However, the Protective Order also contemplates that such materials may be filed without sealing or redaction, including with the consent of the producing party, or after obtaining an order of the Court that so permits. Protective Order ¶ 73. Unless you first provide your consent, the UCC intends to ask the Court to allow the UCC Privileges Submissions to be filed on the public docket without sealing or redaction, except that the UCC does not intend to seek that relief with respect to Exhibits A, B and C to the Hurley Declaration, Exhibits A, B and C to the Preis Declaration, or any Sackler family member addresses or telephone numbers.

Please advise whether you will provide your consent by Wednesday December 2, 2020. We also are available tomorrow if you have any questions or wish to discuss.

Sincerely,

/s/ Mitchell Hurley
Mitchell P. Hurley



November 30, 2020

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cc: Andrew Troop (*Pillsbury Winthrop Shaw Pittman LLP*)
Jason Sharp (*Pillsbury Winthrop Shaw Pittman LLP*)
Kenneth Eckstein (*Kramer Naftalis & Frankel LLP*)
Rachael Ringer (*Kramer Naftalis & Frankel LLP*)
Seth Schinfeld (*Kramer Naftalis & Frankel LLP*)